Hearing Aid Compatible Telephones WT Docket No. 01-309 RM-8658

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- (1) <u>Digital wireless phones tested</u>: Carrier operates a GSM and TDMA system and acquires wireless telephone handsets manufactured by Nokia, Motorola, NEC and Sony Ericsson (collectively, "Vendors"). To Carrier's knowledge, these Vendors are not presently offering any GSM or TDMA devices that are compliant with the U3 or U3T ANSI C63.19 standard ("Compliant Phones"). Accordingly, no phone devices have been tested to date.
- (2) <u>Laboratory used</u>: Carrier does not presently conduct internal testing of handset devices for compliance with the ANSI C63.19 standard. Carrier has not yet contemplated the means whereby such testing would be conducted. Carrier is likely to rely on its Vendors to conduct such testing, and to further rely on their representations regarding the compliance of each specific handset device.
- (3) <u>Test results for each phone tested</u>: No tests have been conducted to date.
- (4) <u>Identification of compliant phone models and ratings according to ANSI C63.19</u>: Carrier has not yet identified any available GSM or TDMA handset devices that are compliant with the ANSI C63.19 U3 standard.

- (5) <u>Status of product labeling</u>: Carrier typically relies upon its Vendors to label all products prior to their shipment to Carrier's retail locations. To Carrier's knowledge, no Vendor has made arrangements for product labeling that makes reference to HAC.
- (6) Outreach efforts: When compliant phones become available they will be publicly identified for consumers and audiologists. Compliant phones will be listed on Carrier's web sites, and the information will be communicated to consumer groups. Carrier will train its retail salespeople regarding which digital wireless phones are compliant. Written materials, pamphlets and other promotional literature will be provided at the point of sale, addressing the needs of individuals with hearing disabilities. Carrier will consider developing consumer education programs aimed at reaching hearing aid and cochlear implant users. Consumers will be given a 30-day trial period within which to try out digital wireless phones to determine whether they will work properly with their hearing aids; flexible return policies will apply to consumers seeking to obtain compliant phones. Toward this end, Carrier may conduct outreach activities toward audiologists and hearing aid dispensers who are in a position to inform hearing aid users in advance concerning the immunity of their hearing aids and the degree of likelihood that they will be able to use particular digital wireless phones and services.
- (7) <u>Retail availability of compliant phones</u>: No Compliant Phones are presently available in Carrier's retail outlets.
- (8) <u>Incorporation of hearing aid compatibility features into newer models of digital wireless phones</u>: Carrier is unaware of the specific plans of its Vendors to incorporate HAC features into future GSM or TDMA phones.
- 9) <u>Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order</u>: Carrier is unaware of specific activities that its Vendors are undertaking to comply with the referenced FCC Order. Carrier is ready and willing to offer compliant devices to interested customers, and will encourage its Vendors to expedite the availability of such handset devices.
- (10) <u>Number of compliant and non-compliant phone models offered at this time</u>: Carrier's core assortment presently includes 8 models of GSM handsets and 8 models of TDMA handsets. None of these are Compliant Phones.

(11) <u>Differences in handset offerings among regions in service areas, if</u> any:

There are no differences in handset offerings among regions in Carrier's service area. Carrier's handset offerings are presently consistent in all markets.

(12) <u>Ongoing efforts for interoperability testing with hearing aid devices</u>: To date, Carrier has not conducted interoperability testing due to the non-availability of Compliant Phones.